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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Assessment and Collection of) MD Docket No. 95-3
Regulatory Fees for Fiscal)
Year 1995)

**COMMENTS OF
COMSAT VIDEO ENTERPRISES, INC.**

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SUMMARY

A fee must be reasonably related to the direct and indirect costs which the Commission incurs in regulating its licensees. National Cable Television Ass'n v. United States, 554 F. 2d 1094, 1106 (D.C. Cir. 1976). Moreover, the Administrative Procedure Act requires the Commission to make available to the public, "in a form that allows for meaningful comment", the information used to develop its proposed fee schedule. See Engine Mfrs. Ass'n v. EPA, 20 F. 3d 1177, 1181 (D.C. Cir. 1994).

However, the Notice fails to justify the proposed exponential increase in fees for transmit/transmit-receive earth stations under these standards. Rather, the Notice simply concludes that the cost of regulation will be \$3,553,239 without any supporting information, making it impossible for a licensee to determine the specific nature of the regulation undertaken for its benefit or the accuracy of the cost. Further, CVE believes the \$185 per meter fee for transmit/transmit-receive earth stations proposed in the Notice of Proposed Rulemaking does not accurately reflect the costs of the Section 9 activities provided for transmit/transmit-receive Ku-band earth stations operating with domestic satellites. In support, Comsearch, Inc. has performed an analysis which indicates that the fee for transmit/transmit-receive earth stations should, in no circumstances exceed \$111, even assuming the \$3.5 million cost of regulation is justified. The Commission must recalculate and reduce the proposed earth station fee consistent with the Communications Act and the limitations on its authority to collect fees, not levy taxes.

CVE's Comments establish that the Commission's blanket approach to fee assessment "has failed to consider important aspect[s] of the problem" and that it has offered an explanation for the proposed fees which "runs counter to the evidence before [it] . . . in violation of the APA." People of California v. F.C.C., 905 F. 2d 1217, 1230 (9th Cir. 1990) quoting Motor Vehicles Mfrs. Ass'n v. State Farm Mutual Auto Ins. Co., 463 U.S. 29, 43 (1983). Elementary principles of fairness and due process require the Commission to respond by identifying the precise nature of the Section 9 activities which benefit each individual licensee and by demonstrating with specificity that the annual fees for each licensee actually reflect the cost of regulation.

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COMMENTS OF COMSAT VIDEO ENTERPRISES, INC.

COMSAT Video Enterprises, Inc. ("CVE") herein submits its Comments in response to the Federal Communications Commission's Notice of Proposed Rulemaking ("Notice") in the above-captioned proceeding. Specifically, CVE, whose annual fee for the earth stations in its NBC television distribution system would rise from \$2,646 to approximately \$250,000, wishes to comment on the \$185 per meter annual fee which is proposed to be assessed on transmit/transmit-receive earth stations.¹

Introduction

In August 1993, as part of the Omnibus Reconciliation Act of 1993, Congress added Section 9 to Title I of the Communications

¹ CVE's NBC television distribution system is an SCPC system, transmitted via domestic Ku-band satellites to NBC's affiliates. It consists of 175 transmit/receive stations, six transportable earth stations and two master earth stations located in New York, New York and Burbank, California.

Act.² Section 9 authorizes the Commission to assess and collect annual regulatory fees "to recover costs incurred in carrying out its enforcement activities, policy and rulemaking activities, user information services and international activities."³

Subsequently, the Commission adopted rules and a regulatory fee schedule to recover its regulatory costs for Fiscal Year 1994 ("FY 1994").⁴ In this Notice, the Commission proposes to revise its method of assessing fees for certain services currently in the fee schedule and, in many cases, to raise exponentially the fees on its licensees purportedly to recover its costs of regulation for Fiscal Year 1995 ("FY 1995"). The fee on transmit/transmit-receive earth stations, for example, will rise from \$6.00 per one hundred antennas less than 9 meters in diameter and \$85 per meter for stations greater than 9 meters, to \$185 per meter, regardless of size.

As discussed in greater detail below, the Notice fails to justify the proposed exponential increase in fees. Rather, the Notice simply concludes that the cost of regulation will be \$3,553,239 without any supporting information, making it impossible for a licensee to determine the specific nature of the

² See 47 U.S.C. § 159(b)(2). The current fee schedule is set forth in 47 C.F.R. §§ 1.1152-1155.

³ Notice, at ¶ 4. These tasks are hereinafter referred to as "Section 9 activities."

⁴ Implementation of Section 9 of the Communications Act, 9 FCC Rcd 5333 (1994).

regulation undertaken for its benefit or the accuracy of the cost.

Further, CVE believes the \$185 per meter fee does not accurately reflect the cost of the Section 9 activities provided for transmit/transmit-receive Ku-band earth stations operating with domestic satellites. In this regard, the Commission's underlying calculation of payment units is incomplete and fundamentally erroneous. Thus, the Notice incorrectly assumes that the cost of regulating all transmit/transmit-receive earth stations is identical, although it is self-evident that the cost of the Commission's enforcement activities for domestic Ku-band transmit stations (which operate in the U.S. on a non-interference basis) cannot be identical to the costs incurred for C-band stations (which operate in a shared band). Nor should domestic Ku-band stations, which are prohibited from providing international services by their licenses, be assessed for the cost of the Commission's international regulatory activities.

If the costs of the Commission's international and enforcement activities for Ku-band transmit/transmit-receive stations are negligible, Ku-band operators, including CVE, should only be assessed for the Commission's minimal Section 9 user information services and policy activities. The Commission must recalculate and reduce the proposed fee consistent with the Communications Act and its authority to collect fees, not levy

taxes.

1. The Proposed Fee Constitutes An Unlawful Tax.

It is well settled that "Congress . . . is the sole organ for levying taxes . . . [while a] public agency . . . may exact a fee for a grant which, presumably, bestows a benefit on the applicant, not shared by other members of society."⁵ A fee is distinguishable from a tax in that it is "a payment for a special privilege or service rendered, and not a revenue measure."⁶ The District of Columbia Circuit described the following test by which it can be determined whether a monetary remission to an agency is a permitted fee or a prohibited tax:

First, the [agency] must justify the assessment of a fee by clear statement of the particular service or benefit which it is expected to reimburse. Second, it must calculate the cost basis for each fee assessed. This involves (a) an allocation of the specific direct and indirect expenses which form the cost basis for the fee to the smallest practical unit; (b) exclusion of any expenses incurred to serve an independent public interest; and (c) a public explanation of the specific expenses included in the cost basis for a particular fee, and an explanation of the criteria used to include or exclude particular terms. Finally, the [agency] must set a fee calculated to return this cost basis at a rate which reasonably reflects the cost of the

⁵ National Cable Television Ass'n v. United States, 415 U.S. 336, 340 (1973) (emphasis added).

⁶ National Cable Television Ass'n v. F.C.C., 554 F.2d 1094, 1106 (D.C. Cir. 1976) ("NCTA").

services performed and value conferred upon the payor.⁷

It follows that "a fee . . . cannot be justified by the revenues received on the profits . . . but must be reasonably related to those attributable direct and indirect costs which the agency actually incurs in regulating (servicing) the industry."⁸ Moreover, "the Administrative Procedure Act requires the agency to make available to the public, in a form that allows for meaningful comment, the data the agency used to develop the proposed rule."⁹ Section 9 of the Communications Act substantially embodies these requirements in authorizing the FCC to establish and collect fees to recover the costs of regulation.¹⁰

However, the FCC has failed to justify the proposed increases in the fees for satellite earth stations under these standards. In its original FY 1994 fee schedule, Congress established fees recovering total common carrier revenue of \$26.1 million. The Commission now proposes to raise that total revenue

⁷ Electronic Indus. Ass'n v. F.C.C., 554 F.2d 1109, 1117 (D.C. Cir. 1976).

⁸ NCTA, 554 F.2d at 1107.

⁹ Engine Manufacturers Ass'n v. EPA, 20 F.3d 1177, 1181 (D.C. Cir. 1994).

¹⁰ 47 U.S.C. § 159(a)(1).

requirement to \$57 million, an increase of approximately 118%.¹¹ However, the fees associated with satellite earth stations are proposed to increase a far greater percentage, as much as 3,000%.¹² The impact on CVE will be to increase its fees from \$2,646 in 1994 to \$250,000 in 1995.

It is unreasonable to believe that the costs of regulation or the benefits received by earth station licensees could have increased so dramatically in only one year's time. Indeed, even if possible, any such inference would be negated by the fact that the proposed massive increase in the fees associated with satellite earth stations is plainly disproportionate to the overall increase in regulatory costs for the Common Carrier Bureau. This raises serious concerns that the revenues to be collected through the new fees will not be appropriately related to the costs of the regulatory activities of the Bureau on behalf of satellite earth station licensees.¹³

¹¹ Although the agency in Appendix G states that the increase is 218%, what it in fact appears to be suggesting is that the total revenue requirement has more than doubled.

¹² The fees for transmit/receive and transmit only earth stations of less than nine meters are proposed to increase from \$6 per one hundred antennas to \$185 per antenna meter for each antenna. The fees for transmit/receive and transmit-only earth stations larger than nine meters are proposed to increase from \$85 per meter to the same rate of \$185 per meter. Notice, at ¶ 50.

¹³ See House Conf. Rep. No. 103-213, 103rd Cong. 1st. Sess. reported at 7A U.S. Code Cong. and Admin. News 1088, 1188 (1993); FY 1994 Order, 8 FCC Rcd at 5335; Notice, at ¶ 6.

Thus, the Commission has failed to justify the proposed increase with reference to the permitted amendment factors established in Section 9 and the cases discussed above. Instead, the FCC simply characterizes the Congressionally-established difference in the fee structure and levels applicable to small and large earth stations as an "anomaly" and announces its intent to remove that "disparity" based solely on similarities between the antenna function performed.¹⁴ Under existing law, such an unsupported rationalization is manifestly insufficient to legitimize the proposed increase.¹⁵

2. The Commission Should Undertake And Publish An Accounting Which Sets Forth The Line Item Costs And Specific Section 9 Activities For Earth Station.

Although the Commission has associated a cost of \$3,553,239 with regulating the U.S. transmit/transmit-receive earth stations, the Notice contains absolutely no support for this conclusion. At a minimum, a detailed accounting of the overhead and employees' time and identification of the Section 9 activity undertaken for each licensee is necessary to support and

¹⁴ Notice, at ¶ 49.

¹⁵ See People of Calif. v. F.C.C., 905 F. 2d 1217, 1230 (9th Cir. 1990). CVE recognizes that the regulatory fee provisions of the Communications Act contain language which purports to limit judicial review of "proportionate increases or decreases" in fees and amendments to the initial fee schedule. See 47 U.S.C. §§ 159(b)(2) and (b)(3). However, the proposed increase in fees is not "proportionate" nor necessary in the public interest. See 47 U.S.C. §§ 159(b)(1)(A) and (b)(2). Rather, it constitutes a massively disproportionate increased levy in the nature of a tax.

determine the accuracy of the FCC's determination. CVE believes that such an accounting and a complete identification of the Section 9 activities associated with each earth station will demonstrate that the actual cost of regulating CVE's earth stations is negligible and certainly does not approach \$250,000.

3. The Commission Has Incorrectly Estimated The Number Of Payee Units And The Annual Fee For Transmit/Transmit-Receive Earth Stations.

At CVE's request, Comsearch, Inc. has undertaken a detailed analysis of the annual fees proposed for transmit/transmit-receive earth stations. Based on Comsearch's analysis and our review of the FCC's files, it appears that the agency has significantly miscalculated the proposed transmit/transmit-receive earth station fees. Specifically, it appears that approximately 5,000 antenna diameter units which were identified as "international" transmit/transmit-receive units were not included in the Commission's total of 19,100 payee units.¹⁶ Further, the 19,100 unit total apparently fails to include multiple antennas on a single license and may not include antenna diameters for stations operating pursuant to developmental and Special Temporary Authority or transportable units. Finally, the Commission's calculations appear to have ended in May 1994, although an additional several thousand units have been

¹⁶ The Notice describes payee units as consisting of the sum total of authorized transmit/transmit-receive earth stations expressed in units of diameter. Notice, at ¶ 50.

authorized between May 1994 and the October 1, 1994 date for determining the fee for transmit/transmit-receive earth stations.

As a result, CVE estimates that the total number of payee units is not 19,100 units, but rather approximately 32,000 units, and that the actual fee should be approximately \$111 per meter rather than \$185 per meter, even assuming that the purported \$3.5 million cost of regulation is justified.¹⁷ We respectfully request the Commission to recalculate this fee, in light of the foregoing.

4. Section 9 Earth Station Activities And Costs Vary Depending On The Type Of Station.

Beyond underestimating the number of payee units, the Commission's methodology used to calculate the \$185 per meter fee is seriously flawed. Thus, although the costs of the Section 9 activities associated with each type of earth station are completely different, to determine the cost of regulation the Commission lumped domestic transmit/transmit-receive earth stations together with international transmit/transmit-receive stations,¹⁸ stations operating under developmental authority and

¹⁷ The Comsearch study, attached hereto, estimates the total number of payee units for transmit/transmit-receive earth stations to be 30,996, as of July 1, 1994. The study does not take into account units authorized for operation between July 1, 1994 and October 1, 1994, which we estimate to be an additional 1,000.

¹⁸ The Commission's domestic earth station policy and enforcement activities emanate strictly from Title III of the Communications Act of 1934, as amended, and center almost entirely on frequency coordination and non-interference issues. The

temporary-fixed earth stations.¹⁹ Further, the Notice fails to distinguish between C-band and Ku-band domestic earth stations, although Section 9 activities also vary by frequency band,²⁰ and even by size.²¹

Commission's Section 9 activities with regard to U.S. earth stations which operate with the INTELSAT system and separate international satellite systems are largely grounded in the Communications Satellite Act of 1962, as amended, and have evolved subsequent to the dissolution of ESOC to include issues relating to foreign policy and trade considerations. See, e.g., Amendment of Part 25 of the Commission's Rules with Respect to Ownership and Operation of Initial Earth Stations in the United States for Use in Connection with the Proposed Global Communications Satellite System, 5 F.C.C. 2d 812 (1968); Modification of Policy on Ownership and Operation of U.S. Earth Stations which Operate with the INTELSAT Global Communications System, 100 F.C.C. 2d 250 (1984); Establishment of Satellite Systems Providing International Communications, 101 F.C.C. 2d 1046 (1985).

¹⁹ See Routine Licensing of Small Antenna Earth Stations in the 6 GHz and 4 GHz Bands, 64 RR 2d 926 (1988) (FCC Order defining terms and conditions under which a application for certain small domestic fixed earth stations are processed has no relevance to transportable stations which are authorized separately under developmental authority). See also 12-14 GHz Band Transportable Earth Station Notification Procedures, 2 FCC Rcd 5185 (1987).

²⁰ Compare Processing Procedures for Routinely Licensed Domestic Satellite Earth Station Facilities, 2 FCC Rcd 5682 (1987) with Routine Licensing of Earth Stations Less Than Nine Meters and Five Meters in Diameter for Full Transponders and Narrowband Transmissions, Respectively, 2 FCC Rcd 2149 (1987) ("Routine Licensing"). See also Assignment of C-Band Satellite Orbital Spacing Policies to Increase Satellite Video Services to the Home, 7 FCC Rcd 456 (1992).

²¹ See, e.g., 47 C.F.R. § 17.4(f) (FCC policy and enforcement activities with regard to air navigation hazards are only triggered for antennas greater than 6.1 meters in diameter). See also Routine Licensing of Large Networks of Small Antenna Earth Stations Operating in the 12/14 GHz Frequency Bands, 6 FCC Rcd 7372 (1991); Routine Licensing of Earth Stations using Scientific Atlanta Series 4.5 Meter Antennas for Video Program Transmissions in the 14 GHz Frequency Band, 2 FCC Rcd 547 (1987).

For example, the policy issues arising out of a licensee's intent to access Station 4 have no cost implications for CVE's system or, for example, on COMSAT General's C-band TT&C stations.²² The rulemaking proceeding and policy decisions formulated with regard to routine licensing of domestic earth stations in the 6 GHz and 14 GHz bands using antennas less than 9 meters and 5 meters in diameter, respectively for full transponders and narrowband transmission²³ are unrelated to the development of policy for transmit-receive stations operating with the INTELSAT System.²⁴ Enforcement issues raised with respect to transportable earth stations located near runway

²² Although the Notice assesses TT&C stations with the \$185 per meter fee, it is difficult to fathom how any costs can be attributed to TT&C stations, since these stations require no discernible Section 9 activities. See Amendment of Part 25 of the Commission's Rules to Reduce Alien Carriers Interference between Fixed-Satellites at Reduced Orbital Spacings, 8 FCC Rcd 1316, 1317-18 (1986) ("TT&C transmissions are relatively homogenous within the satellite environment. Most, if not all satellite licensees operate similar TT&C transmission packages. This allows for easier inter-satellite interference coordination. The [larger nature of TT&C stations] further reduces the potential for harmful interference...and there is no potential for interference between co-located 4/6 and 12/14 GHz satellites. Finally, TT&C functions are generally placed at the edges of the allocated bands.").

²³ See Routine Licensing, 2 FCC Rcd 2149 (1987).

²⁴ In fact, different international earth stations have required different levels of FCC Section 9 activities. See Modification of Policy on Ownership and Operation of U.S. Earth Stations that Operate with the INTELSAT Global Communications System, 100 F.C.C. 2d 250, 269 (1984) (earth stations dedicated to providing IBS and/or television services do not raise the same concerns about impact on the INTELSAT System that are raised by multi-purpose earth stations).

approaches²⁵ are irrelevant to CVE's C-band stations in Clarksburg, Maryland. Thus, the Notice completely fails to justify the increase in the proposed fee, consistent with the permitted amendment factors established in Section 9 of the Act.

- a. Deregulation Has Sharply Reduced The Costs Incurred With Respect To The Commission's Policy And Rulemaking Activities For Domestic Transmit/Transmit-Receive Earth Stations.

The domestic satellite and earth station industry is mature. Regulations which have been outdated by technological changes, or whose purposes can be more efficiently achieved through the operation of a competitive marketplace, have been eliminated. As a result, government regulation of domestic transmit/transmit-receive earth stations has been sharply reduced to an oversight role.²⁶ There is little, if any, future need for additional ground-breaking policy or rulemaking decisions. Instead, the Common Carrier Bureau's policymaking arm only acts from time to

²⁵ See Streamlining the Commission's Antenna Structure Clearance Procedure, WT Docket No. 95-5, FCC 95-16, released January 20, 1995 (Notice of Proposed Rulemaking).

²⁶ See, e.g., Developmental Stations in the Communications Satellite Service, 6 F.C.C. 2d 250 (1967); American Broadcasting Co., 62 F.C.C. 2d 901 (1972); American Satellite Corp., 72 F.C.C. 2d 750 (1978); Public Broadcasting Co., 70 F.C.C. 2d 185 (1979); Regulation of Domestic Receive-only Satellite Earth Stations, 74 F.C.C. 2d 205 (1979); Establishment of an Advisory Comm. on Implementation of Reduced Orbit Spacing, 102 F.C.C. 2d 390 (1985); Application Filing Requirements for Domestic Earth Station Antennas, 2 FCC Rcd 3657 (1987); Extended Use of the 14 GHz Band for Domestic Fixed-Satellite Services, 2 FCC Rcd 6814 (1987); Processing Procedures for Routinely Licensed Earth Station Facilities, 2 FCC Rcd 5682 (1987); 12-14 GHz Band Transportable Earth Station Notification Procedures, 2 FCC Rcd 5185 (1987).

time to fine tune whatever government regulation remains necessary to promote the public interest.

CVE is aware of only one pending rulemaking proceeding directly affecting Part 25 domestic satellite operators, i.e. the two degree spacing FNPRM,²⁷ and the pleading cycle in that 1993 proceeding has long since been completed. In FY 95, the Commission intends to complete a rulemaking relating to antenna marking and lighting²⁸ which may require some very limited policymaking efforts by the staff affecting certain satellite earth stations. Other than this, CVE is not aware of any significant policy and rulemaking activities undertaken in FY 1994, or proposed for FY 1995, requiring significant expenditure by the Commission's staff for Ku-band transmit/transmit-receive earth stations or specifically, for the stations in CVE's network.

b. The Cost Of The Commission's Section 9 Enforcement Activities Is Negligible.

Because there are no co-equal terrestrial users of the 12/14 GHz frequency bands, we believe that the Commission will incur

²⁷ Amendment of Part 25 of the Commissions's Rules to Reduce Alien Carrier Interference Between Fixed-Satellites at Reduced Orbital Spacings and to Revise Application Processing Procedures for Satellite Communication Services, 8 FCC Rcd 1316 (1993) (Further Notice of Proposed Rulemaking).

²⁸ Streamlining the Commission's Antenna Structure Clearance Procedure, WT Docket No. 95-5, FCC 95-16, released January 20, 1995 (Notice of Proposed Rulemaking).

virtually no enforcement costs in FY 1995 with respect to domestic Ku-band stations. Complaints requiring Commission investigation and enforcement activities are virtually non-existent. CVE is aware of no customer or earth station operator complaint against it requiring Commission intervention or enforcement activities, since it began service in 1981. Further, since 1986, we are aware of only one Notice of Apparent Liability assessed for unlicensed operation of a Ku-band station.²⁹ Accordingly, we believe that only negligible costs should be assigned to the Ku-band operators for Section 9 enforcement activities in FY 1995.

c. The Cost of the Commission's Section 9 International Activities Is Not Properly Attributable to CVE.

CVE's licenses, and the vast majority of all Ku-band domestic transmit/transmit-receive licenses, prohibit operation of the earth stations with international satellites. Accordingly, while it is self-evident that there can be no benefits or costs associated with the Commission's Section 9 international activities in FY 1995 for operators of domestic transmit/transmit-receive earth stations, the Notice fails to provide CVE with information to even determine if it is being assessed for Section 9 international activities.

²⁹ See NCR Corp., DA-93-185, adopted January 20, 1993.

d. User Information Services Are Limited.

While CVE and the other earth station operators certainly stand ready to pay their fair share of the costs associated with user information services, it must be noted that the Commission's "domestic" public reference room in 2025 M Street is staffed, we believe, by one full-time employee and is shared with the Multipoint Distribution Service. The reference room relies on a "sign-out method" for obtaining satellite and earth station reference materials and is open to the public only 26 hours per week; it is closed on Fridays. The physical space allocated to the public consists of about sixty square feet; we believe a additional six to seven hundred square feet is devoted to government file cabinets containing the relevant reference materials. The reference room is not computerized.

The Notice contains no cost breakout to enable a payee to determine whether the total costs of user information services, or that portion of costs assigned to earth station operators for user information services provided through this reference room, is reasonable. Further, as the Commission has combined its domestic and international earth station costs, it is also possible that the domestic operators are being assessed with user information costs attributable to international earth station operators or even costs attributable to other common carrier

services.³⁰


Conclusion

CVE has established that the Commission's blanket approach to fee assessment "has failed to consider...important aspect[s] of the problem" and that the Agency has offered an explanation for its proposed fees "which runs counter to the evidence before it . . . in violation of the APA."³¹ Elementary principles of fairness and due process require the Commission to respond by identifying the precise nature of the Section 9 activities which benefit each individual licensee and to demonstrate that its annual fees for each licensee actually reflect the cost of regulation.

Respectfully submitted,

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February 13, 1995

³⁰ Based on overall cost figures, it appears likely that the earth station operators are also being assessed for a portion of the Commission's large public reference room, for the Commission's library and for a great many other unidentified services. An accounting is necessary to determine whether this assessment is proportionate and reasonable.

³¹ People of Calif. v. F.C.C., 905 F. 2d 1217, 1230 (9th Cir. 1990) quoting Motor Vehicles Mfrs. Ass'n v. State Farm Mutual Auto Ins. Co., 463 U.S. 29, 43 (1983). See also Citizens to Preserve Overton Park v. Volpe, 401 U.S. 402, 416 (1971); People of Calif. v. F.C.C., 39 F. 3d 919, 925 (9th Cir. 1994).



February 3, 1995

Mr. Robert A. Mansbach
General Attorney
Comsat Video Enterprises
6560 Rock Spring Drive
Bethesda, MD 20817

Dear Mr. Mansbach:

At your request, Comsearch has performed a count of earth station units of diameter expressed in meters for the entire United States and its possessions. These are earth stations that are transmit/receive or transmit only.

BAND	# OF ANTENNAS	TRANSMISSION	UNITS OF DIAMETER EXPRESSED IN METERS
6 GHz	5077	Transmit/Receive Transmit Only	22,571.2 M
14 GHz	1661	Transmit Only	<u>8,425.2 M</u>
Total Earth stations that are Transmit/Receive or Transmit Only			30,996.4 M

This data set is dated July 1, 1994.

If you have any questions, please do not hesitate to call me.

Sincerely,

Victoria Snead Decker
Product Manager
Strategic Information Services
(703) 476-2798
(703) 476-2767 (fax)